

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

DRAFT

Title V / Synthetic Minor, Operating

Permit: V-08-010

Weyerhaeuser East Kentucky Plant

Chavies, KY 41727

September 17, 2008

Lisa Beckham, Reviewer

SOURCE ID: 21-193-00097

AGENCY INTEREST: 3457

ACTIVITY: APE20080001

**SOURCE DESCRIPTION:**

On January 4, 2008 Weyerhaeuser submitted an application for a renewal permit for the Weyerhaeuser East Kentucky Plant in Chavies, Kentucky. Additional information was received on February 27, 2008, July 15, 2008, and August 13, 2008. The application was considered complete on August 18, 2008.

The Weyerhaeuser East Kentucky Plant produces Laminated Strand Lumber (LSL) using whole hardwood logs. In the LSL manufacturing process, the logs are debarked, cut to length, and processed into thin, long strands. The strands are then dried, coated with polyurethane MDI resin and emulsified wax, and formed into rough billets. The billets are pressed to a size approximately 8-ft wide by 48-ft long with various thicknesses in a steam injection press heated with thermal oil. The billets are then rough-sanded and dimensioned and prepared for shipment. LSL is used as a stable lumber "core" material for the window and door industry and as high-grade structural lumber for residential construction.

With the renewal permit, the Boiler MACT (40 CFR 63 Subpart DDDDD) requirements for EU 01 have been removed due to the vacature of the Boiler MACT by the U.S Court of Appeals on July 30, 2007. The PCWP MACT (40 CFR 63 Subpart DDDD) requirements for EU 02 have been incorporated into the permit, including operating limits set based on initial compliance demonstration results. The equipment associated with the I-Joist department of the facility has been removed from the permit, as the equipment has been shutdown and the process is no longer in operation (except for one remaining bundle saw, EU 22). Weyerhaeuser also requested that the 1,000 lb/wk limit of burning oil-soaked rags in EU 01 be increased to 2,000 lb/wk and be changed to allow the use of other absorbents (e.g. mulch and sawdust) to soak up oil spills. Based on the MSDS provided by Weyerhaeuser of the oils being cleaned up, the Division concurs with the increase in the amount of oil-soaked absorbents burned.

**APPLICABLE REGULATIONS:**

401 KAR 59:010, New process operations, applicable to an emission unit that commenced on or after July 2, 1975.

401 KAR 59:015, New indirect heat exchangers, applicable to an emissions unit with a capacity of less than 250 MMBtu/hr which commenced on or after April 9, 1972.

40 CFR 60, Subpart Dc, Standards of performance for small industrial-commercial-institutional

steam generating units, applies to each steam generating unit commenced after June 8, 1989 that has a maximum design heat input capacity between 10 and 100 MMBtu/hr.

40 CFR 63, Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products (PCWP), applies to each PCWP manufacturing facility located at a major source of HAP emissions.

40 CFR 64, Compliance Assurance Monitoring (CAM)

**NON-APPLICABLE REGULATIONS:**

401 KAR 51:017, Prevention of significant deterioration of air quality. The permittee has taken voluntary federally enforceable emission limitations to preclude the applicability of these standards.

**COMMENTS:**

**Emission Units 01 (MP 01-01, 01-02, 01-03): Indirect Heat Exchangers**

Weyerhaeuser operates three 75 MMBtu/hr wood-fired indirect heat exchangers. These units heat thermal oil for use in the log conditioning ponds, the steam press, and for providing heat to the facility. Each unit contains two firing cells, equipped to fire bark, chips and other wood fiber material. Fuel for these units is recovered from the debarking, sawing, stranding, and sanding processes at the facility. MP 01-01 is equipped with an auxiliary propane burner (rated at 35 MMBtu/hr) for emergency use. PM emissions from these units and EU 02, Rotary Dryers are controlled by an electrified filter bed (EFB). Before entering the EFB, the exhaust gas from the wood-fired indirect heat exchangers passes through a set of multiclones to remove ash and is then sent to EU 02, as a direct heat source. Emissions from EU 01 and 02 all pass through the EFB before venting to a common stack. At certain times however, there may be a heat demand from the plant when one or both rotary dryers are offline. In these cases, the exhaust from the wood-fired indirect heat exchangers bypasses the rotary dryers and is routed directly to the EFB and out the main stack.

Up to 2,000 lb/week of used oil-soaked absorbents may also be fired in these units. Because the oil-soaked absorbents may contain VOC or hazardous air pollutants any future performance tests on these units related to chlorine, hydrogen chloride, VOC or HAPs shall include a representative sample of oil-soaked absorbents in the fuel, as this represents the worse-case emissions potential.

In June 2008, Weyerhaeuser conducted stack testing to determine emissions of PM, CO and NO<sub>x</sub> from EU 01 and 02. EPA Method 5 was used to determine PM emissions, EPA Method 10 was used to determine CO emissions and EPA Method 7E was used to determine NO<sub>x</sub> emissions. Testing was conducted under three scenarios: when emissions from EU 01 vent directly to the EFB (without being sent through EU 02 first), when 50% of the emissions from EU 01 vent directly to the EFB and 50% are sent through EU 02 first, and when all emissions from EU 01 pass through EU 02 before venting to the EFB. The suspension burners from EU 02 also operated during the testing. Emission results, are based on total heat input from EU 01 and the suspension burners of EU 02. CO and NO<sub>x</sub> emissions were determined at the exit of EU 01 (before EU 02 and the EFB). Based on the stack test results Weyerhaeuser will use an emission factor of 0.24 lb/MMBtu for CO and 0.23 lb/MMBtu for NO<sub>x</sub> for this unit. For PM emissions from this unit Weyerhaeuser will use the most recent compliance demonstration test, from February 2004, of 0.056 lb/MMBtu until future stack tests have been performed. Because the stack tests in June 2008 were performed as part of supplemental information for the renewal permit additional testing of CO and NO<sub>x</sub> for these units will not be

required during this permitting term.

While these units send exhaust gases as direct heat to EU 02, they will always be subject to 40 CFR 60 Subpart Dc and 401 KAR 59:015 because they are used to heat thermal oil to transfer heat throughout the facility. 40 CFR 60 Subpart Dc is applicable to steam generating units and defines a steam generating unit as a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. 401 KAR 59:015 is applicable to indirect heat exchangers and defines an indirect heat exchanger as any piece of equipment, apparatus or contrivance used for the combustion of fuel in which the energy produced is transferred to its point of usage through a medium that does not come in contact with or add to the products of combustion. The exhaust gas stream from EU 01 that is sent to EU 02 is applicable to 40 CFR 63 Subpart DDDD, the PCWP MACT, which regulates organic HAP emissions. This means emissions of organic HAPs from the indirect heat exchangers exhaust stream must be included with EU 02 when determining compliance of the rotary dryers with the PCWP MACT.

*The following emission limitations apply when burning wood:*

Pursuant to 401 KAR 52:020, Section 26, the propane auxiliary burner of MP 01-01 shall not be operated simultaneously with the wood-fired furnaces.

Pursuant to 401 KAR 52:020, Section 26, the maximum quantity of oil-soaked absorbents burned in the furnaces shall not exceed 2,000 lbs/week.

Pursuant to §60.43c (b), the permittee shall not cause to be discharged into the atmosphere any gases that contain PM in excess of 0.10 lb/MMBtu heat input, for each unit.

Pursuant to §60.43c (c), the permittee shall not cause to be discharged into the atmosphere any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Pursuant to §60.43c (d), the PM and opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

Pursuant to 401 KAR 59:015, Section 5(1)(a), sulfur dioxide emissions shall not exceed 0.8 lb/MMBtu heat input, based on a twenty-four-hour average, for each unit.

*The following emission limitations apply when using the propane burner:*

Pursuant to 401 KAR 59:015 Section 4(1), particulate emission shall not exceed 0.10 lb/MMBtu (3-hr average), for each unit.

Pursuant to 401 KAR 59:015, Section (4)(2), visible emissions shall not exceed 20 percent opacity, except:

1. For a maximum of 40 percent opacity shall be permissible for not more than 6 consecutive minutes in any 60 consecutive minutes during cleaning the fire box or blowing soot and
2. For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that

recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

Pursuant to 401 KAR 59:015, Section 5(1)(a), sulfur dioxide emissions shall not exceed 0.8 lb/MMBtu heat input, based on a twenty-four-hour average, for each unit.

Pursuant to 401 KAR 50:045, within 180 days after issuance of permit V-08-010, the permittee shall conduct a performance test for PM using EPA Reference Method 5. The testing shall be conducted under conditions representative of maximum emissions potential under anticipated operating conditions at the pollutant-specific emissions units. The EFB ionizer indicator range shall be set based on continuous data collected during stack tests. The indicator range shall be the average of the 3 lowest 15-minute block average amperages recorded during testing. These units will only be permitted to operate at 110% of the total heat input (MMBtu/hr, 3-hr average) achieved during testing.

Pursuant to 401 KAR 50:045, if the EFB ionizer amperage data drops below the lower limit indicator range more than 5% of the operating time in a calendar quarter the Division may require a stack test to demonstrate compliance with the PM emission standard. The Division may waive this testing requirement upon a demonstration that the cause of the excursion has been corrected.

Pursuant to §60.47c (a), the owner or operator shall install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system.

Pursuant to §60.47c (b), all COMS for measuring opacity shall be operated in accordance with the applicable procedures under Performance Specification 1 of appendix B to 40 CFR 60. The span value of the opacity COMS shall be between 60 and 80 percent.

Pursuant to §60.48c (g)(2), the permittee shall monitor and maintain records of the amount of fuel combusted (tons for wood and scf for propane) during each calendar month. If the propane burner is used the reason it was used shall also be recorded.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the EFB ionizer amperage on an hourly basis.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the total heat input (Btu) on a monthly basis.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the amount of oil-soaked absorbents combusted (lbs) on a weekly basis.

Pursuant to 401 KAR 52:020, Section 26, once per calendar year the permittee shall monitor and maintain records of the heat content (Btu/lb) of the wood burned. The permittee may meet this requirement using fuel analysis.

Pursuant to 401 KAR 50:055, Section 5, the EFB shall be maintained and operated in accordance with manufacturer's specifications and/or standard operating practices and so that the EFB ionizer

amperage does not drop below the lower limit indicator range more than 5% of the operating time during each calendar quarter.

**Emission Unit 02 (MP 02-01, 02-02): Rotary Dryers**

The facility uses two rotary dryers to reduce the moisture content of the strands used in the LSL product at a combined rate of 35 ODT/hr. (ODT refers to oven dried tons.) Each dryer is equipped with a 50 MMBtu/hr suspension burner that burns wood residuals collected from the facility's processes. The suspension burners also burn a small amount of propane to help stabilize the flame in the burners. The exhaust stream from Emission Unit 01 also supplies heat to the dryers.

The exhaust gas from each rotary dryer is routed through a dryer cyclone. A portion of the hot exhaust gas is re-circulated to the rotary dryer inlet and the balance is ducted to the EFB before discharging out the stack to the atmosphere. Dry un-combusted wood residuals collected in the dryer cyclones are pneumatically conveyed to the dry fuel bin to be reprocessed.

As mentioned under Emission Unit 01, Weyerhaeuser conducted stack testing on emissions from this unit in June 2008. CO and NO<sub>x</sub> emissions for this unit were determined at the exit of the dryers and before the EFB stack. Based on the information obtained during the stack tests Weyerhaeuser will use a CO emission factor of 0.43 lb/MMBtu and a NO<sub>x</sub> emission factor of 0.45 lb/MMBtu for the dryers. PM emissions during stack testing were determined at the exit of the EFB and are based on strand throughput of the dryer. An emission factor for PM from this unit of 0.41 lb/ODT will be used. This emission factor represents emissions of EU 01 and 02 from the burning of wood and from the strand drying process. Since this unit receives exhaust gases from EU 01, any future stack test for chlorine, hydrogen chloride, VOC or HAPs on these units shall include a representative sample of oil-soaked absorbents in the fuel to EU 01, as this represents the worse-case potential emissions. Additionally, emissions of organic HAPs from the EU 01 exhaust stream shall be included when determining compliance with the HAP emission limits under the PCWP MACT for rotary strand dryers.

Pursuant to §63.2250, the permittee must be in compliance with the compliance options, operating requirements, and the work practice requirements of 40 CFR 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in §63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

Pursuant to §63.2250 (b), the permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

Pursuant to §63.2250 (c), the permittee must develop a written SSMP according to the provisions in §63.6(e)(3).

Pursuant to §63.2240 (a), §63.2260(a) and Table 2 to 40 CFR 63 Subpart DDDD, the permittee must maintain on a daily basis the following operating parameters within the ranges established during the performance test according to §63.2262(n):

Unit	Operating Parameter	Operating Range
MP 02-01 (Dryer #1)	Dryer Inlet Temperature	602°F maximum based on a 3-hr block average
MP 02-02 (Dryer #2)	Dryer Inlet Temperature	542°F maximum based on a 3-hr block average

Pursuant to 401 KAR 52:020, Section 26, dried strand production shall not exceed 35 ODT/hr based on a monthly average.

Pursuant to §63.2240(a), the permittee must meet the production-based total HAP compliance option in Table 1A to Subpart DDDD of Part 63 of 0.18 lb/ODT of total HAP emissions for rotary strand dryers. The permittee may not use an add-on control system or wet control device to meet the production-based compliance options.

Pursuant to 401 KAR 59:010, Section 3(2), particulate emissions from the stack shall not exceed  $[3.59(P)^{0.62}]$  pound per hour based on a three-hour average where P is the monthly average processing rate in tons per hour. If the process rate weight is 1,000 lbs/hr or less than the limit on particulate matter emissions is 2.34 lbs/hr.

Pursuant to 401 KAR 59:010, Section 3(1)(a), any continuous emissions into the open air shall not exceed twenty (20) percent opacity based on a six-minute average.

Pursuant to §63.2269(b), for each temperature sensor, the permittee must meet the requirements of 63.2269(a) and (b)(1) through (2):

Pursuant to 63.2271 (a) and Table 7 of Subpart DDDD to Part 63, the permittee shall collect and record on a daily basis the inlet temperature to each dryer.

Pursuant to §63.2270 (a), the permittee must monitor and collect data according to §63.2770.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the amount of wood (tons) and propane (scf) burned and the total heat input (MMBtu) of the suspension burners on a monthly basis.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor the amount of strands processed through the dryers on a monthly basis.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor the heat content (Btu/lb) of the wood used on an annual basis. The permittee may meet this requirement using fuel analysis.

Pursuant to §64.3 (d)(1), the continuous opacity monitoring system (COMS) required for Emission Unit 01 shall be used to satisfy the compliance assurance monitoring requirements of 40 CFR 64. Emission Units 01 and 02 vent to a common stack and Emission Unit 01 is required to operate a COMS under 40 CFR 60 Subpart Dc.

Pursuant to 63.2282(b), the permittee must maintain records on a daily basis of the inlet temperature to each dryer.

**Emission Units 03,05-08, 11, 22, 23, 30: Process Equipment**

Emission Unit 03: Steam Injection Press

A steam injection press is used to create the LSL billets by compacting mats of strands under high temperature and pressure. This unit can process 38.4 ODT/hr. Emissions of PM, VOC, and MDI are associated with this equipment. Heat for the top and bottom platens of the press as well as the steam generator are provided by thermal oil pumped from EU 01. Emissions generated from the press are exhausted out a dedicated stack serving the press area.

Emission Unit 05: Saw System #1

Full size pressed billets are processed to specific dimensions in an automated finishing line to edge the LSL. PM emissions from this unit are collected using baghouse #4 for fuel in EU 01 and 02. This unit can process 69 ODT/hr.

Emission Unit 06: Saw System #2

The finishing saw system is used to cut the billets to attain the final desired sizes. PM emissions from this unit are collected using baghouse #5 for fuel in EU 01 and 02. This unit can process 69 ODT/hr.

Emission Unit 07: Sanding Operations

Full size pressed billets undergo a sanding operation. PM emissions from this unit are collected using baghouse #6 for fuel in EU 01 and 02. This unit can process 69 ODT/hr.

Emission Unit 08: Stranding Operations

Debarked and conditioned logs are delivered to two stranders that process the logs into material called strands. The strands are stored in one of four green strand bins that retain the material until ready for further processing. The strands are then conveyed into one of two rotary strand dryers (EU 02), which are used to reduce the moisture content of the strands to the desired level. PM emissions from this unit are collected using baghouse #1 for fuel in EU 01 and 02. This unit can process 66 ODT/hr.

Emission Unit 11: Wood Dust Conveying

Wood dust generated in the sawing and sanding operations is collected via pick-up ducts and is pulled by draft to cyclone/baghouse capture systems dedicated to each process – Baghouse #4 for saw system #1, baghouse #5 for saw system #2, and baghouse #6 for sanding operations. Wood residuals recovered from these capture systems are pneumatically conveyed to either the dry fuel bin or truck loading area. This unit can process 66 ODT/hr.

Emission Unit 22: Bundle Saw

The Bundle Saw is used for dimensioning specialty LSL products in small batches. Wood dust generated from this saw is pulled by draft to a baghouse (Baghouse #8) where it is collected and recovered. It is then pneumatically conveyed to either the dry fuel bin or truck loading area via the High Pressure Relay System (EU 23). This unit can process 15.6 ODT/hr

Emission Unit 23: High Pressure Relay

A high pressure relay system is used to recover dust emissions from EU 22. The wood residuals are sent to the dry fuel bin or truck loading area. This unit can process 0.204 ODT/hr.

Emission Unit 30: Fuel Preparation Equipment

Dry wood from the dry wood fuel bin is conveyed as needed to the dry wood fuel prep system, which is used to reduce the size of the material for metering into the suspension burners for fuel. The

dry wood passes through a series of two hammermills that pulverize the wood fuel. The pulverized dry wood is accumulated in a wood fuel metering bin, from which the fuel is then conveyed to the suspension burners associated with each rotary dryer. Wood dust generated from the hammermills is captured and recovered in baghouse #10. This unit can process 6 ODT/hr.

To preclude the applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, PM emissions from each unit shall not exceed the amount below based on a twelve-month rolling total:

<b>Emission Unit</b>	<b>Emission Unit Name</b>	<b>Emission Factor (lb/ton)</b>	<b>PM Emissions (ton/yr – twelve-month rolling total)</b>
03	Steam Injection Press	0.03125	5.3
05	Saw System #1	0.03106	9.4
06	Saw System #2	0.03106	9.4
07	Sanding Operation	0.03106	9.4
08	2 Stranding Operations	0.03970	11.5
11	Wood Dust Conveying – Truck Bin	3.38346	16.9
22	Bundle Saw	0.1385	9.46
23	High Pressure Relay – Baghouse #9	1.1785	1.6
23	High Pressure Relay – Truck Bin	10.7143	9.57
30	Fuel Prep Equipment	0.1417	3.7

Twelve-month rolling totals shall be calculated monthly and reported semi-annually (see Section F). The permittee shall maintain onsite a log of the twelve-month rolling totals and make them available for review by the Division.

Pursuant to 401 KAR 59:010, Section 3(2), particulate emissions from the stack shall not exceed  $[3.59(P)^{0.62}]$  pound per hour based on a three-hour average where P is the monthly average processing rate in tons per hour. If the process rate weight is 1,000 lbs/hr or less than the limit on particulate matter emissions is 2.34 lbs/hr.

Pursuant to 401 KAR 59:010, Section 3(1)(a), any continuous emissions into the open air shall not exceed twenty (20) percent opacity based on a six-minute average.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall perform a qualitative visible observation of the opacity emissions from each stack on a weekly basis and maintain a log of the observations. If visible emissions from the stack are seen, then the opacity shall be determined using EPA Reference Method 9 and if the opacity reading is greater than twenty percent, then initiate an inspection of the equipment for any repairs.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the amount of material processed (tons) for each unit on a monthly basis.

#### **Emission Unit 10: Forming Line**

Dry strand from the dry strand bins and screens are conveyed to the forming line (EU 10), where



they pass through fully enclosed blenders and are sprayed with liquid polyurethane MDI resin and wax. The MDI serves as the wood adhesive while the wax serves as a water absorption inhibitor. Optionally, zinc borate powder can also be added to increase preservative properties of various finished products. The resinated strands from the blenders are conveyed to each of four strand mat formers, which lay-up a continuous mat of aligned strands on a continuous forming belt. The completed mats are then cut into sections and are conveyed into the steam press (EU 03).

Other than from the forming line and the steam press, the MDI (methylene diphenyl diisocyanate) used in this process is not expected to have significant emissions at the facility. MDI has a very low vapor pressure ( $<0.000015$  mmHg @  $20^{\circ}\text{C}$ ) and the chances of it volatilizing after the billets have been pressed are greatly reduced.

To preclude the applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, PM emissions from this unit shall not exceed 14.5 tons per year based on a twelve-month rolling total.

Twelve-month rolling total shall be calculated monthly and reported semi-annually (see Section F). The permittee shall maintain onsite a log of the twelve-month rolling total and make it available for review by the Division.

Pursuant to 401 KAR 59:010, Section 3(2), particulate emissions from the stack shall not exceed  $[3.59(P)^{0.62}]$  pound per hour based on a three-hour average where P is the monthly average processing rate in tons per hour. If the process rate weight is 1,000 lbs/hr or less than the limit on particulate matter emissions is 2.34 lbs/hr.

Pursuant to 401 KAR 59:010, Section 3(1)(a), any continuous emissions into the open air shall not exceed twenty (20) percent opacity based on a six-minute average.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall perform a qualitative visible observation of the opacity emissions from each stack on a weekly basis and maintain a log of the observations. If visible emissions from the stack are seen, then the opacity shall be determined using EPA Reference Method 9 and if the opacity reading is greater than twenty percent, then initiate an inspection of the equipment for any repairs.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the amount of material processed (tons) on a monthly basis.

Pursuant to 401 KAR 52:020, Section 26, the permittee shall monitor and maintain records of the amount of MDI used on a monthly basis.

### **Emission Unit 25: Haul Road**

Trucks on unpaved surfaces for deliveries and shipments

Pursuant to 401 KAR 63:010, Section 3(1), no person shall cause, suffer, or allow any material to be handled, processed, transported, or stored; a building or its appurtenances to be constructed, altered, repaired, or demolished, or a road to be used without taking reasonable precaution to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, when applicable, but not be limited to the following:

1. Pursuant to 401 KAR 63:010, Section 3(1)(b), application and maintenance of asphalt, oil, water or suitable chemicals on roads, materials stockpiles, and other surfaces which can create airborne dusts.
2. Pursuant to 401 KAR 63:010, Section 3(1)(d), covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.
3. Pursuant to 401 KAR 63:010, Section 3(1)(e), the maintenance of paved roadways in a clean condition.
4. Pursuant to 401 KAR 63:010, Section 3(1)(f), the prompt removal of earth or other material from a paved street which earth or other material has been transported thereto by trucking or earth moving equipment or erosion by water

Pursuant to 401 KAR 63:010, Section 3(3), when dust, fumes, gases, mist, odorous matter, vapors, or any combination thereof escape from a building or equipment in such a manner and amount as to cause a nuisance or to violate any administrative regulation, the secretary may order that the building or equipment in which processing, handling and storage are done be tightly closed and ventilated in such a way that all air and gases and air of gas-borne material leaving the building or equipment are treated by removal or destruction of air contaminants before discharge to the open air.

Pursuant to 401 KAR 63:010, Section 4(4), no one shall allow earth or other material being transported by truck or earth moving equipment to be deposited onto a paved street or roadway.

Pursuant to 401 KAR 63:010, Section 3(2), no person shall cause or permit the discharge of visible fugitive emissions beyond the lot line of the property on which the emissions originate.

#### **Emission Unit 26 and 27: Miscellaneous Coating Operations**

Once manufactured to size, the finished product is stamped, stacked, strapped and packaged for shipment. An inkjet printer (EU 26) is used to imprint the LSL with appropriate identification markings. The LSL may also pass through an edge and end seal process (EU 27) that applies a coating to edges and ends of the LSL products.

Pursuant to §63.2250, the permittee must be in compliance with the work practice requirements of 40 CFR 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in §63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events.

Pursuant to §63.2250 (b), the permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in §63.6(e)(1)(i).

Pursuant to §63.2250 (c), the permittee must develop a written SSMP according to the provisions in §63.6(e)(3).

Pursuant to §63.2241 (a) and Table 3 to Subpart DDDD of Part 63, the permittee must use non-HAP coatings as defined in §63.2292

Pursuant to §63.2282, the permittee must keep records according to §63.2282(a) and (b), as applicable.

Pursuant to §63.2283, the permittee must maintain records according to §63.2283 (a)-(c), as applicable.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

To preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, total source-wide emissions of carbon monoxide shall not exceed 225 tons per year based on a twelve month rolling total.

To preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, total source-wide emissions of nitrogen oxides shall not exceed 225 tons per year based on a twelve month rolling total.

To preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, total emissions of particulate matter from Emission Unit 01 and 02 shall not exceed 125 tons per year based on a twelve month rolling total.

To demonstrate compliance with these emission limitations, the twelve-month rolling totals shall be calculated monthly and reported semi-annually. The permittee shall maintain onsite a log of the 12-month rolling totals and make them available for review by the Division.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.